

Submitter: Anna K Keppen

On Behalf Of:

Committee: Senate Committee On Health Care

Measure, Appointment or Topic: HB3824

Dear Committee Members,  
May 8 2025

I am writing to express my strong opposition to House Bill 3824, specifically regarding the inclusion of "needle insertion" (Page 3, Line 37) within the scope of practice for physical therapists. A licensed acupuncturist undergoes over 3,000 hours of rigorous training, including extensive supervised clinical education, I am deeply concerned about the implications this bill has on patient safety and the integrity of established medical practices.

#### Legal and Regulatory Concerns

Under Oregon law, "acupuncture" is defined as the stimulation of specific points on the body by the insertion of needles, including the use of electrical or mechanical devices with or without needles (ORS 677.757) . Practicing acupuncture without proper licensure from the Oregon Medical Board is considered the unauthorized practice of medicine and is subject to penalties (ORS 677.765)

Allowing physical therapists to perform procedures involving needle insertion, commonly referred to as "dry needling," directly conflicts with these statutes. It effectively permits the practice of acupuncture without the requisite licensure and oversight, undermining the regulatory framework designed to protect public health.

#### Education and Patient Safety

Licensed acupuncturists in Oregon are required to complete comprehensive education programs that encompass thousands of hours of training, including significant clinical experience. In contrast, dry needling courses for physical therapists often involve minimal training, sometimes as little as 20 hours.

This disparity in training raises serious concerns about patient safety. Studies have documented adverse events associated with dry needling performed by inadequately trained individuals, including cases of pneumothorax and nerve injury. Such incidents underscore the necessity of ensuring that only properly trained and licensed professionals perform needle insertion procedures.

#### Conclusion

The inclusion of "needle insertion" in the scope of practice for physical therapists as proposed in HB 3824 poses significant risks to patient safety and contravenes existing Oregon laws governing medical practice. I urge you to remove this provision from the bill to uphold the standards of care and protect the well-being of our community.

Thank you for your attention to this critical matter.

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